

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

|  |   |                           |
|--|---|---------------------------|
|  | X |                           |
|  | : |                           |
| In re:   | : |                           |
|  | : | PROMESA                   |
| THE FINANCIAL OVERSIGHT AND                      | : | Title III                 |
| MANAGEMENT BOARD FOR PUERTO RICO,                | : |                           |
|  | : | Case No. 17-BK-3283 (LTS) |
| as representative of                             | : |                           |
|  | : | (Jointly Administered)    |
| THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> , | : |                           |
|  | : |                           |
| Debtors. <sup>1</sup>                            | : |                           |
|  | X |                           |

**ORDER GRANTING URGENT MOTION OF THE LAWFUL CONSTITUTIONAL  
DEBT COALITION TO FILE UNDER SEAL CERTAIN PORTIONS OF ITS  
OBJECTION TO THE MOTION OF NATIONAL PUBLIC FINANCE GUARANTEE  
CORPORATION FOR ENTRY OF AN ORDER DIRECTING AN INDEPENDENT  
INVESTIGATION**

[Relates to ECF No. \_\_\_\_]

Upon consideration of the *Urgent Motion of the Lawful Constitutional Debt Coalition to File Under Seal Certain Portions of Its Objection to the Motion of National Public Finance Guarantee Corporation for Entry of an Order Directing an Independent Investigation* (the “Motion”),<sup>2</sup> the Court having jurisdiction to consider the Motion and the relief requested therein

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233 (LTS)) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not defined herein are defined in the Motion.

pursuant to section 306(a) of PROMESA, notice of the Motion having been adequate and appropriate under the circumstances, and after due deliberation and sufficient cause appearing therefore, it is hereby ORDERED that:

1. The Motion is GRANTED as set forth herein.
2. The LCDC is authorized to file under seal the Confidential Exhibit and to redact any references to the Confidential Material in its Objection.
3. The parties entitled to access the unsealed Confidential Exhibit and references thereto are those that are parties to the Mediation.
4. The duration of the period of the seal for the unredacted version of the Objection shall be determined by the Court.
5. This Order is without prejudice to the rights of any party in interest to seek to unseal the Confidential Material.
6. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: October \_\_\_, 2020

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HONORABLE LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE